

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of

U.S. Postal Service Priority Mail parcel bearing label no. 9505
5114 4941 0175 2992 05 addressed to "Laura Lynn, 3831
Conway Dr Columbus, Ohio 43227."

Case No.

2:20-mj-451

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

U.S. Postal Service Priority Mail parcel bearing label no. 9505 5114 4941 0175 2992 05 addressed to "Laura Lynn, 3831 Conway Dr Columbus, Ohio 43227."

located in the Southern District of Ohio, Eastern Division, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1) and 843(b).

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Title 21 USC 841(a)(1)

Offense Description

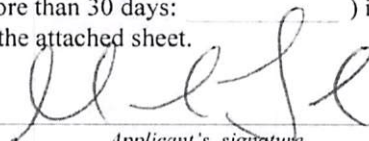
Possession with intent to distribute
a controlled substance

Title 21 USC 843(b)

Prohibited use of a communication center (U.S. Mail)

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector MOHAMED A. SABRAH

☒ Continued on the attached sheet.☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

MOHAMED A. SABRAH, U.S. POSTAL INSPECTOR

Printed name and title

Sworn to before me and signed in my presence.

Date:

June 26, 2020

City and state: COLUMBUS, OHIO



Chelsey M. Vascara, U.S. Magistrate Judge

Printed name and title



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF:

U.S. Postal Service Priority Mail parcel bearing
label no. 9505 5114 4941 0175 2992 05
addressed to "Laura Lynn, 3831 Conway Dr
Columbus, Ohio 43227."

Case No. _____

MAGISTRATE JUDGE
Kimberly A. Jolson

Affidavit in Support of Application for Search Warrant

I, MOHAMED A. SABRAH, DO HEREBY DEPOSE AND SAY:

1. I have been a U.S. Postal Inspector for the U.S. Postal Inspection Service (USPIS) since February, 2016, enforcing federal mail and drug laws; currently assigned to Columbus, OH. I have received training at U.S. Postal Inspection Service National Training Seminars for mail-related criminal investigations and have investigated cases with other federal, state, and local law enforcement units. I have received an additional 40 hour Prohibited Mailings training by the U.S. Postal Inspection Service.
2. I know from my training and experience, and the training and experience of other Postal Inspectors, I am aware the U.S. Mail is often used by drug traffickers to transport controlled substances as well as U.S. currency derived from their illicit activities, either as proceeds and/or payment. I know from my training and experience the Priority Mail system is commonly used to transport controlled substances and associated currency because Priority Mail provides traceability, reliability, and timely delivery. The guaranteed delivery timeframe of Priority Mail places time pressures on law enforcement agents to identify, search, and deliver these drug parcels in a timely manner.
3. As a result of past investigations and prosecutions, the Postal Inspection Service has determined that a number of indicators can be used to identify packages containing contraband that have been entered into the Priority Mail network. Inspectors routinely review shipment documents and Priority Mail packages originating from or destined to drug source areas, to identify instances where there is a possibility of drug trafficking.
4. On June 24, 2020, due to an on-going investigation of narcotics being mailed from Southern California to Central Ohio, law enforcement identified a U.S. Postal Service Priority Mail parcel bearing label no. 9505 5114 4941 0175 2992 05 (SUBJECT PARCEL), which was believed to contain narcotics, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance) and 843(b) (illegal use of mail in furtherance of narcotics trafficking). Inspectors identified this as a suspected drug parcel based on several characteristics, including but not limited to type of mail, origin, destination, label, and size.
5. On June 25, 2020, Postal Inspectors took custody of U.S. Postal Service Priority Mail parcel bearing label no. 9505 5114 4941 0175 2992 05, addressed to "Laura Lynn, 3831 Conway Dr Columbus, Ohio 43227", with a return address of "Monica Robinson, 580 Main St Brawley, CA 92227". The subject parcel is further described as a white and red U.S. Postal Service Priority Mail medium flat rate

box, measuring 12 x 3 x 14, and weighing 2 lbs, 13 oz. The subject parcel was mailed on June 23, 2020, from the Brawley, CA Post Office 92227 with \$15.05 postage affixed.

6. Your affiant ran both the return and recipient addresses in CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information.
7. According to CLEAR, the return address 580 Main Street Brawley, CA 92227, does exist, but Monica Robinson cannot be associated as a resident.
8. According to CLEAR, the recipient address 3831 Conway Drive Columbus, Ohio 43227, does exist, but Laura Lynn cannot be associated as a resident.
9. Your affiant knows that in the past, drug traffickers have used fake names at legitimate addresses to receive parcels containing illegal narcotics, and have used addresses belonging to others for the sender/return address, in an attempt to legitimize and distance themselves from the shipment in the event that the parcel is seized by law enforcement officers. Additionally, California is a known source area for shipment of illegal narcotics to Central Ohio as well as other areas of the United States.
10. I know from my training and experience that individuals who regularly handle controlled substances often leave the scent of controlled substances, for which narcotic-sniffing canines are trained to indicate alert, on the box, contents of the box, and/or other packaging material they handle.
11. On June 26, 2020, Postal Inspectors contacted Officer Brian Carter, Columbus Police Department, who is the handler for "Odja", a drug detection dog most recently certified by the Ohio Peace Officers Training Council for the detection of marijuana, hashish, cocaine, "crack", heroin, methamphetamine, and their derivatives. K-9 "Odja" has had 200 hours of training at Gold Shield Training Kennels, Blacklick, OH, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 "Odja" has successfully detected narcotics, demonstrating clear, positive, aggressive alerts, and establishing himself as a highly reliable police dog.
12. The subject parcel was hidden among other packages, and "Odja" was allowed to search the entire area. Officer Carter concluded that K-9 "Odja" did alert positively to U. S. Postal Service Mail parcel bearing label number 9505 5114 4941 0175 2992 05. Based on that alert, Officer Carter concluded that the odor of one of the drugs that K-9 "Odja" is trained and certified to detect was present.

13. Based on the information contained herein, your affiant maintains there is probable cause to believe that the USPS Priority Mail parcel bearing tracking number 9505 5114 4941 0175 2992 05, addressed to "Laura Lynn, 3831 Conway Dr Columbus, Ohio 43227," contains controlled substances, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).



Mohamed Sabrah
United States Postal Inspector

Sworn to before me, and subscribed in my presence, this 26 day of June, 2020 at Columbus, Ohio.

